

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

SIMON J. BURCHETT PHOTOGRAPHY, INC.,	:	
Plaintiff,	:	Case No. 19-CV-01576-DAB
v.	:	DEFENDANT'S NOTICE OF
A.P. MOLLER MAERSK A/S,	:	MOTION TO DISMISS FIRST
Defendant.	:	<u>AMENDED COMPLAINT</u>
	:	

PLEASE TAKE NOTICE that Defendant A.P. Moller Maersk A/S, pursuant to Rule 12 of the Federal Rules of Civil Procedure, the Local Rules of the Southern District of New York, and the Individual Rules of this Court, and upon (1) the accompanying memorandum of law in support of this motion to dismiss, and (2) the declaration of Mark Krsulic, dated March 15, 2019, and the exhibit thereto, hereby moves to be heard before the Honorable Deborah A. Batts, United States District Court Judge, on a date and at a time designated by the Court, at the United States Courthouse for the Southern District of New York, for an order granting the Defendant's motion to dismiss the First Amended Complaint in its entirety with prejudice, and for such other and further relief as the Court deems just and proper.

Dated: New York, New York
March 15, 2019

MORGAN, LEWIS & BOCKIUS LLP

By: /S/ Zoe Phillips
Zoe Phillips (ZR2563)
101 Park Avenue
New York, New York 10178
E-mail: zoe.phillips@morganlewis.com
Tel. No.: 212-309-6000
Fax No.: 212-309-6001

David W. Marston Jr. (*to be admitted pro hac vice*)
1701 Market Street
Philadelphia, PA 19103
david.marston@morganlewis.com
Tel: 215-963-5000
Fax: 212-963-5001

Attorneys for Defendant A.P. Moller Maersk A/S